

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

<b>IN RE GOOGLE INC. COOKIE PLACEMENT CONSUMER PRIVACY LITIGATION This Document Relates to All Actions</b>	<b>CASE NO 12-MD-2358</b>
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**PLAINTIFFS' SECOND MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT WITH GOOGLE, LLC**

**TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiffs Jose M. (“Josh”) Bermudez, Nicholas Todd Heinrich, and Lynne Krause (“Plaintiffs”) hereby move the Court for an order certifying a settlement class and preliminarily approving a settlement with Defendant Google Inc. (“Google”). Plaintiffs file this motion pursuant to Federal Rule of Civil Procedure 23, on the grounds that the requirements for class certification are met and the proposed settlement is fair, reasonable, and adequate. This motion is based on the facts stated in this motion; the attached brief in support; the Declarations of Brian R. Strange, Stephen G. Grygiel, and James P. Frickleton; the other papers on file with the Court in this action; and all other evidence and argument the Court permits counsel to present regarding this matter.

Dated: January 3, 2020

Respectfully submitted,

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